

## **Origin Capital Ltd - Privacy Policy**

This policy sets out how Origin Capital Ltd or other entities it controls (together "Origin") use and protect an individual's personal data, including data from our website.

### **1. Application**

Origin is the Data Controller for personal data about employees, investees, potential investors, newsletter subscribers or when sending marketing material which you may reasonably expect to receive or have consented to receive.

Origin collects different types of personal data about these parties to:

- provide the information and services which these parties have consented or may reasonably expect to receive
- market Origin's products and services
- process recruitment records

Origin may also collect anonymised website statistics using cookies, so that Origin can improve our website.

### **2. Individual's rights**

As an individual whose personal data is processed by Origin, you have the following rights:

- the right to be informed (which is the purpose of this Privacy Policy)
- the right to access the data Origin holds about you
- the right to object to direct marketing (by contacting Origin at the address below, or via email)
- the right to object to processing carried out on the basis of legitimate interests (to provide the information or service that you might reasonably expect or in accordance with a contract)
- the right to erasure of data (unless Origin has a legal obligation to retain it)
- the right to have your data restricted or blocked from processing
- the right to have inaccurate personal data rectified, or completed if it is incomplete.

An individual can make a request for rectification in writing by post to Origin's Data Protection Officer (DPO), Tim de Vere Green at 7A, 26-32 Voltaire Rd London SW4 6DH. Origin will respond to any such request within one calendar month. Origin will confirm to you that inaccurate personal data has been rectified or completed if it is inaccurate.

### **3. Contacting you**

If we hold your personal data you may receive telephone calls or emails from Origin if you've asked to be contacted, or if we considers there is a legitimate interest in doing so, to provide information or services that you might reasonably expect or in accordance with a contract. You have the ability to opt-out of being contacted by Origin at any point.

Origin also engages in business to business marketing activity.

### **4. Security of your data**

Origin will store your data securely and will do the utmost to protect user data and privacy.

Origin contractors will only ever process your data on our behalf and under appropriate instructions from us.

## **5. Changes to this policy**

Origin will publish any changes to this policy in this document. Where the changes are significant, Origin, we may also email our registered users details of the changes.

## **6. Use of cookies**

Origin may collect anonymised website statistics using cookies. A cookie is a small file of letters and numbers which websites may send to a computer to make a user's experience of a website better.

Origin may use cookies to:

- collect anonymised data about the number of visitors to pages, so we can improve the website and ensure that content is easy to find and engaging.
- to remember your preferences, for text sizes, for example. Again, this information is processed anonymously.

For information on controlling cookies visit <http://www.aboutcookies.org>

## **7. Sharing your information**

Origin will not sell, trade or rent your personal information.

Origin will only otherwise share anonymised data with third parties except where we consider there is a legitimate interest or we have a relevant legal obligation or to comply with a governmental or police request, in which case we may share specific data including an individual's name and contact details.

## **9. Contacting Origin about data**

Origin's Data Protection Officer ("DPO") is Tim de Vere Green, to whom any queries regarding Origin's use or processing of data should be addressed, but writing to him at: 7A, 26-32 Voltaire Rd London SW4 6DH.

## **10. Your right to complain**

If you are not satisfied with the way that Origin handles your data, you have the right to complain to the Information Commissioner's Office at Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.

**Origin Capital Ltd (FRN 684349) is an Appointed Representative of Larpent Newton & Co Ltd, which is authorised and regulated by the Financial Conduct Authority (FRN 141275).**